

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

American Foreign Service Association, *et al.*,

Plaintiffs,

v.

President Donald J. Trump, *et al.*,

Defendants.

Case No. 1:25-cv-00352

**NOTICE OF WITHDRAWAL OF MOTION
FOR TEMPORARY RESTRAINING ORDER**

Plaintiffs hereby notify the Court of their withdrawal of their motion for a temporary restraining order, ECF No. 53. Plaintiffs make this withdrawal based on the representations in Defendants' Opposition and supporting declaration, as well as correspondence between Counsel, that:

- USAID will not destroy “any additional documents after March 11, 2025, without first notifying Plaintiffs and providing an opportunity to raise the issue before this Court.” ECF No. 59 at 2; *see also* ECF No. 59-1 ¶ 13. Defendants' counsel have confirmed to Plaintiffs that this obligation will apply throughout the pendency of this case.
- The documents destroyed on March 11, 2025, were limited to “(1) copies of classified documents that were originally classified by other government agencies, or (2) derivatively-classified documents that were created for the purposes of, but not limited to, high-level meetings, official government travel, and intelligence briefings, which USAID no longer has a need to retain.” ECF No. 59 at 7.
- If “originally classified USAID documents” and “current classified program files” “had not met their retention requirement in accordance with the disposition schedule approved by the National Archives and Records Administration (NARA),” those documents were retained and will be stored. ECF No. 59-1 ¶ 7.
- No personnel records were destroyed. ECF No. 59 at 7.

Plaintiffs reserve all rights to make a new or renewed motion for a temporary restraining order or preliminary injunction based on future notice from Defendants or on the disclosure of new facts.

Dated: March 13, 2025

Respectfully submitted,

/s/ Lauren Bateman

/s/ Kaitlyn Golden

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